

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOE HAND PROMOTIONS, INC., §
§
Plaintiff, §
§
vs. § Civil Action No. 4:22-cv-02235
§
GLOW HOOKAH LOUNGE, INC., §
d/b/a GLOW HOOKAH LOUNGE, §
d/b/a GLOW HOOKAH BAR & GRILL, and §
d/b/a GLOW HOOKAH LOUNGE & GRILL, §
SHARIQ ASHRAF KHAN, §
SHAMIM AHMED KHAN, §
MUHAMMAD ADNAN, §
§
Defendants. §

**SHAMIM AHMED KHAN AND GLOW HOOKAH LOUNGE, INC.'S
ANSWER TO ORIGINAL COMPLAINT FILED BY JOE HAND PROMOTIONS, INC.**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, hereby answers the allegations of the Plaintiff, **Joe Hand Promotions, Inc.**, and assert affirmative defenses as follows:

ADMISSIONS AND DENIALS

1. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, admit the allegations contained in paragraphs 1 and 2.
2. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, lack knowledge or information sufficient to form a belief as to Plaintiff's allegations contained in paragraph 3. Accordingly, the allegations are denied.

3. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, admit the allegations contained in paragraph 4 (b), ©, and (e), but deny the remaining allegations contained in paragraph 4.

4. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, admit the allegations contained in paragraph 5 (a), (b), ©, and (d) but deny the remaining allegations contained in paragraph 5.

5. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, admit the allegations contained in paragraph 6 (a) and (b) but deny the remaining allegations contained in paragraph 6.

6. Since Muhammad Adnan has been dismissed from this suit, no responsive pleading is required. To the extent a responsive pleading is deemed to be required, Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.** deny the allegations contained in paragraph 7.

7. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, deny the allegations contained in paragraph 8.

8. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's allegations contained in paragraphs 9, 10 & 11. Accordingly, the allegations are denied.

9. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, deny the allegations contained in paragraphs 12, 13, 14, 15 & 16.

10. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, admit the allegations contained in paragraph 17.

11. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, deny the allegations contained in paragraphs 18 & 19.

12. The allegations in paragraph 20 state legal conclusions to which no responsive pleading is required. To the extent a responsive pleading is deemed to be required, Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.** deny the allegations contained in paragraph 20.

13. Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, deny the allegations contained in paragraphs 21, 22, 23, 24 & 25.

AFFIRMATIVE DEFENSES

14. Plaintiff has failed to state a cause of action upon which relief may be granted.

15. Individual Defendants have been sued in their improper capacity.

16. Plaintiff's claims are barred by waiver and consent.

17. Pleading further and without waiving the foregoing, Defendants, **Shamin Ahmed Khan and Glow Hookah Lounge, Inc.**, assert that the incident in question was proximately caused or solely proximately caused by the negligent and/or wrongful conduct of third-parties outside the control of this Defendant.

Respectfully submitted,

J. Nathan Overstreet & Assoc., P.C.

/s/ J. Nathan Overstreet

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Attorney for Defendants
Joe Hand Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has document has been served on all counsel of record in accordance with Rule 5 of the Federal Rules of Civil Procedure on this the 11th day of October, 2022, through the court's electronic filing system.

/s/James Nathan Overstreet
James Nathan Overstreet

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